

SPEARS & IMES LLP

51 Madison Avenue
New York, NY 10010
tel 212-213-6996
fax 212-213-0849

Joanna C. Hendon
tel 212-213-6553
jhendon@spearsimes.com

February 1, 2019

BY ECF

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Jane Doe, et al. v. The Trump Corporation, et al., 18-cv-09936 (LGS)

Dear Judge Schofield:

We are counsel for Defendants in the captioned matter and, with the consent of Plaintiffs, respectfully write pursuant to Rule III.B.4 of the Court's Individual Rules and Procedures for Civil Cases to request the entry of a briefing schedule for Defendants' motion to dismiss Plaintiffs' amended complaint, filed on January 31, 2019. By way of background, Plaintiffs filed their original complaint on October 29, 2018, and Defendants timely moved to dismiss that pleading on January 14, 2019.

Counsel for the parties have conferred about a proposed briefing schedule for Defendants' motion to dismiss the amended complaint and jointly propose the following deadlines:

- Defendants will file their motion to dismiss on or before February 21, 2019;
- Plaintiffs will file their opposition to Defendants' motion on or before March 7, 2019; and
- Defendants will file their reply on or before March 14, 2019.

The parties have also agreed, subject to the Court's approval, that the parties will be limited to thirty pages for their memoranda in support of and in opposition to the motion, and twelve pages for the reply (*i.e.*, the page limits ordered by the Court on December 20, 2018, in connection with Defendants' motion to dismiss the original complaint).

If Your Honor is inclined to grant these requests, we respectfully ask that Your Honor enter the proposed order attached.

Respectfully submitted,

A handwritten signature in blue ink that reads "Joanna C. Hendon" followed by a stylized flourish or initials.

Joanna C. Hendon

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE, et al.,

Plaintiffs,

-against-

THE TRUMP CORPORATION, et al.,

Defendants.

18 Civ. 9936 (LGS)

[PROPOSED] ORDER

LORNA G. SCHOFIELD, District Judge:

WHEREAS, on January 31, 2019, Plaintiffs filed an amended complaint.

WHEREAS Defendants wish to file a motion to dismiss the amended complaint, it is
hereby

ORDERED that Defendants shall file their motion to dismiss the amended complaint by
February 21, 2019, Plaintiffs shall file their opposition by **March 7, 2019**, and Defendants shall
file their reply by **March 14, 2019**. The parties are limited to thirty pages for their memoranda
in support of an in opposition to the motion, and twelve pages for the reply.

SO ORDERED.

Dated: February ___, 2019
New York, New York

Lorna G. Schofield
United States District Judge